

IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA

In re:  
Edwin C. Knecht, Jr., and Tammy L. Knecht

No. 4:17-bk-05290 Chapter 7

Jersey Shore State Bank,  
Movant

v.

Edwin C. Knecht, Jr., and Tammy L. Knecht and  
John P. Neblett, Trustee  
Respondents

**MOTION FOR RELIEF FROM STAY**

1) Jersey Shore State Bank (hereinafter “Movant”) is a secured creditor in the matter captioned above, based upon the fact that the Debtors have a loan with Movant secured by a mortgage lien on multiple parcels of real property owned by the Debtors (hereinafter collectively the “Premises”).

2) The Debtors are in payment default of the terms of the repayment terms of the loan secured by the mortgage. For that reason, the Bank filed the attached Complaint in Mortgage Foreclosure.

3) Bank obtained a judgment by default in mortgage foreclosure against the Debtors in the amount of \$214,730.37, together with pre-judgment and post-judgment interest at the contract rate, reasonable attorney’s fees, and costs of suit, and executed upon that judgment.

4) There are multiple Internal Revenue Service liens on the Premises, as listed in the Complaint attached hereto.

5) The Debtors have not offered Bank adequate protection of Bank’s mortgage interest by additional collateral, or by periodic payments, or otherwise. Thus, Bank’s mortgage lien is not adequately protected.

WHEREFORE, Movant respectfully requests this Honorable Court grant Movant relief from the automatic stay, permitting Movant to foreclose Movant's interest in the Premises, to proceed to Sheriff's sale pursuant to applicable state law, and to apply the proceeds of that foreclosure to the secured indebtedness.

**ELION, GRIECO, CARLUCCI,  
& SHIPMAN, P.C.**  
**/s/William P. Carlucci**  
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**CERTIFICATE OF CONCURRENCE ON MOTION FOR RELIEF FROM STAY**

Counsel for the Debtor advised the undersigned by telephone on January 30, 2018, that counsel for the Debtors concurs in this Motion. Thus, the undersigned confirmed the concurrence of the Trustee by email, on that same date.

**ELION, GRIECO, CARLUCCI,  
& SHIPMAN, P.C.**  
**/s/William P. Carlucci**  
William P. Carlucci, Esquire  
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